### BEFORE THE

### STATE CORPORATION COMMISSION

### **OF VIRGINIA**

Application of	)
Verizon Virginia Inc. and	) Case No. PUC-2007
Verizon South Inc.	
For a Determination that Retail Services Are	)
Competitive and Deregulating and Detariffing	)
of the Same	)

# LYNCHBURG (LYN)

# **EXHIBITS**

**PUBLIC VERSION** 

# Lynchburg (LYN) Exhibits

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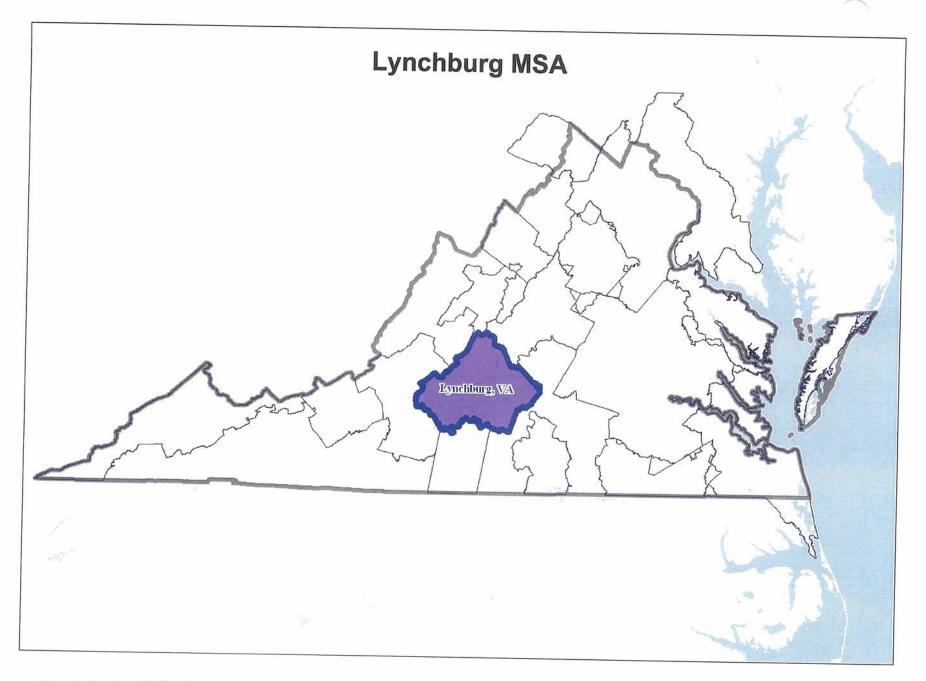


Exhibit LYN-1, page 1 of 3

Lynchburg MSA Region Boundary Verizon Service Territory Lynchburg, VA Non-Verizon Service Territory County Boundary Amherst Appomattox

Appomattox Bedford 460,60 Timberlake 460 460 Campbell

Exhibit LYN-1, page 2 of 3

Lynchburg MSA Region Boundary Verizon Wirecenter Boundaries Lynchburg, VA Non-Verizon Wirecenter Boundaries PNRVV LYBGVAMH, LYBGVACH Bedford 46060 Timberlake 460 RSBGVAXA GLDYVAXA

Exhibit LYN-1, page 3 of 3

### COMPETITION AND POTENTIAL COMPETITION FOR RETAIL TELECOMMUNICATIONS SERVICES IN VERIZON'S LYNCHBURG MSA SERVICE TERRITORY

Report of Jeffrey A. Eisenach, Ph.D. January 17, 2007

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#### I. OVERVIEW

Verizon's service territory in the Lynchburg MSA consists of 1,789 square miles, with a population of 215,697 living in 86,608 households as of 2006; there are 8,655 business establishments. The average population density is 121 residents per square mile, and the median household income is \$44,842.2 Verizon operates sixteen wire centers in the MSA.3

The Lynchburg MSA is located in the 434 and 540 area codes, and includes portions of Bedford, Amherst, Campbell and Appomattox counties. It is bordered on the northwest by Rockbridge and Botetourt Counties, on the northeast by the Charlottesville Region and Nelson County and by Buckingham County, on the south by Roanoke County and the Roanoke MSA and on the southwest by Charlotte County. The Pamplin wirecenter in the far southeast portion of the region extends into Prince Edward County, where it is contiguous with the Southside Region's CCHSVAXA wire center.5

The region is a mix of urban and rural areas, with eight of the sixteen wire centers having population densities below 100 persons per square mile; the least densely populated is the Allwood wire center, in the northwest portion of the region, with a population density of 17 persons per square mile; the LYBGVATM wire center, at the opposite extreme, has a density of 1,172 persons per square mile.6

Competition for telecommunications services is intense throughout the Lynchburg MSA and becoming more so. Facilities-based wireline competition is extensive, led by facilities-based CLECs such as [BEGIN CONFIDENTIAL] There is a company of the type of the contract and

### [END CONFIDENTIAL]

by currence other than Voryson.

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Mobile wireless coverage is ubiquitous, and [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] consider their cell phone to be their primary telephone.

With respect to broadband, as about two thirds of all households have access to cable modem service, there is competition for DSL service from facilities-based CLECs, and wireless broadband providers also service the region.

<sup>1.</sup> See Exhibit LYN-4.

<sup>2.</sup> See id.

<sup>3.</sup> See Exhibit LYN-3.

<sup>4.</sup> See Exhibit LYN-1.

See Exhibit LYN-3.

See Exhibit LYN-4.

See Exhibit LYN-14. IBEGIN CONFIDENTIAL | 1

There are no barriers to entry. Significant entry has already occurred and more is underway. For example, Comcast, which recently acquired Adelphia's cable facilities in the Lynchburg MSA, will be rolling out cable telephony in the very near future. In addition, new broadband providers, including providers utilizing BPL and fixed wireless technologies, have recently begun, or soon will begin, providing next generation broadband services, including coverage of the most rural areas of the region. Long-haul fiber facilities are available from several competitive carriers.

The analysis below of the availability and usage of existing alternative services, and of the conditions associated with potential competition and new entry, demonstrates that competition already regulates the prices of Verizon's retail telephony services in the Lynchburg MSA, and that further entry and even more intense competition is a virtual certainty.

#### II. AVAILABILITY OF ALTERNATIVE SERVICES

All 86,608 households in the Lynchburg MSA and all 8,655 businesses in the Lynchburg MSA have the option to obtain alternatives to Verizon's BLETs, OLETS and Bundled Services from competitive providers. Facilities-based competition is widespread, and includes both traditional CLECs and cable providers, numerous CLECs also provide services through resale and/or Wholesale Advantage agreements. Mobile telephone service is ubiquitous, and broadband service is widely available.

#### A. Traditional CLECs<sup>8</sup>

Traditional CLECs provide robust competition throughout the Lynchburg MSA, and facilities-based competition is widespread.

#### [BEGIN CONFIDENTIAL]

[END CONFIDENTIAL] In addition, as discussed below, the company offers both mobile and

portable broadband service in the region.

In addition, all households and businesses in the Lynchburg MSA can receive service from traditional CLECs through resale and/or Wholesale Advantage services available from Verizon. As of March 2006, [BEGIN CONFIDENTIAL]

Here and in the remaining sections of this report, unless otherwise indicated, "traditional CLEC" refers to CLECs other than cable companies. "CLEC" refers to both traditional CLECs and cable companies.
 See Exhibit LYN-15 and Exhibit LYN-17. The E911 data includes lines that are unable to be assigned to

See Exhibit LYN-15 and Exhibit LYN-17. The E911 data includes lines that are unable to be assigned to
a wire center. These unassignable lines are included in the aggregate competition information. This leads
to some under representation of E911 lines when broken out by wire center.

<sup>10.</sup> See Exhibit LYN-4 and Exhibit LYN-15.

<sup>11.</sup> See Exhibit LYN-16.

#### [END CONFIDENTIAL]

#### Altogether, a total of [BEGIN CONFIDENTIAL]

**END** 

# CONFIDENTIAL] 14

#### B. Cable Telephony

Four cable companies service the Lynchburg MSA: Comcast, which purchased the former Adelphia franchise, Charter, Cox, and Jet Broadband. Comcast's service territory includes 53.8 percent of the households, Charter's service territory includes 0.9 percent of the households, Cox's service territory includes 1.9 percent of the households, and Jet Broadband service territory includes 8.6 percent of the households. Cox offers cable telephony in Lynchburg throughout its service territory. Comcast and Charter have infrastructures that are capable of providing cable telephony service, and both companies have announced plans to deploy cable telephony in the near future. If Jet Broadband is in the process of upgrading its infrastructure and will complete the process by year-end.

#### C. Mobile Telephony

Of the 85,608 households in Lynchburg MSA, 100 percent have access to two or more CMRS carriers. <sup>19</sup> In addition to Verizon Wireless, there are six CMRS providers offering retail telephone services in the Lynchburg MSA. They are Alltel, Cingular, NTELOS, Sprint, T-Mobile, and US Cellular. <sup>20</sup>

<sup>12.</sup> See Exhibit LYN-15.

<sup>13.</sup> See Exhibit LYN-15.

<sup>14.</sup> See Exhibit LYN-14.

<sup>15.</sup> See Exhibit VA-10 and Exhibit LYN-7.

<sup>16.</sup> See Exhibit VA-10 and Exhibit LYN-9.

<sup>17.</sup> See West Testimony at 42. See also Comcast, FAQ, https://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=3804 (last visited Dec. 3, 2006); id. at https://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=3807 (last visited Dec. 3, 2006).

<sup>18.</sup> Press Release, Jet Broadband, System Upgrade has Begun! (June 1, 2006), available at http://www.jetbroadband.com/pages/pressDetail/upgrade\_06\_01\_06.php.

<sup>19.</sup> See Exhibit LYN-12.

<sup>20.</sup> See Exhibit LYN-11.

As of 2006, there are 78 cellular towers in the Lynchburg MSA.<sup>21</sup> Of these, 17 have been constructed since 2004.<sup>22</sup> There is at least one cellular tower located in the area served by fifteen of the sixteen Verizon wire centers.<sup>23</sup>

#### D. Broadband and VoIP

Increasingly, consumers are choosing to combine stand-alone broadband Internet access with VoIP services provided by "bring your own access" companies such as Vonage, thus creating their own bundles of broadband and retail telephony services. Both broadband and VoIP services are available to at least 64.7 percent of Lynchburg MSA households and businesses.

Cable Modem and DSL Service: Three of the four cable providers, Comcast, Charter, Cox, offer cable modem service throughout their service territories in the Lynchburg MSA, and Jet Broadband offers cable modem to all but about 400 of the 7,000 homes it passes. Altogether, 64.7 percent of households are passed by cable modem service. In addition, Verizon makes DSL service without voice available to retail customers for \$26.99 per month; DSL services are available to [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]

<u>Fixed Wireless Service</u>: In addition to wireline cable modem and DSL, over half of households (57 percent) have access to fixed wireless broadband services.<sup>27</sup> Providers include:

• NTELOS Portable Broadband: NTELOS offers its Portable Broadband service to 51 percent of the households in the Lynchburg region, as shown in Figure 1 and in Exhibit LYN-13. NTELOS Portable Broadband is a fixed wireless service that provides users with a small external modem which is portable throughout the covered service territory. The service does not require a separate antenna or dish. It delivers speeds of up to 1.5 Mbps downstream and 550 Kbps upstream for \$34.95 per month.<sup>28</sup>

<sup>21.</sup> See Exhibit LYN-10.

See id

Compare Exhibits LYN-3 and LYN-10.

<sup>24.</sup> See Exhibit VA-10 and Exhibit LYN-8.

<sup>25.</sup> See id.

<sup>26.</sup> See Exhibit VA-4.

See id.

See NTELOS, Portable Broadband, http://www.ntelos.com/landline/residential/portablebroadband.html (last visited Nov. 22, 2006).

PORTABLE BROADBAND
SERVICE AREA

PORTABLE BROADBAND
SERVICE AREA

O Peddler Mills

Amherst County

Lynchburg

Appomatox
County

Forest

Regional
Airport

Rustburg

Rustburg

- <u>Lynchburg.net</u>: Lynchburg.net provides fixed wireless broadband services to the Lynchburg MSA. The company focuses on offering business solutions, with prices available upon contact with customer service representatives.<sup>29</sup>
- NetWave Internet: NetWave Internet offers fixed wireless broadband services in Amherst, Bedford and Campbell Counties and the city of Lynchburg.<sup>30</sup> The company offers both residential and business solutions, and prices can be obtained by contacting a customer service representative.<sup>31</sup>

While the firms discussed above do not offer bundles that include VoIP services, customers have the option of purchasing alternatives to Verizon's BLETS, OLETS and Bundled Services from by-pass VoIP companies. VoIP providers that offer telephone numbers in the 540 area code include Net2Phone, SunRocket, Vonage, and Packet8.<sup>32</sup>

#### E. Overall Availability of Alternative Platforms and Competitors

Looking overall at the availability of service from alternative platform providers (i.e., from mobile wireless, cable modem, DSL, facilities-based CLECs and fixed wireless), 100 percent of all households in the Lynchburg MSA have service available from at least one alternative platform provider and 72 percent have service from three or more alternative platforms.<sup>33</sup>

Similarly, looking overall at the availability of service from all competitors – i.e., the same measure as above, but counting each competitor separately (e.g., counting each CMRS provider separately), competition is even more extensive: 100 percent of households have

See Lynchburg.net, Wireless Access, http://www.lynchburg.net/wireless (last visited Nov. 22, 2006).

<sup>30.</sup> See NetWave, Availability, http://www.netwaveinternet.com/index11.htm (last Nov. 22, 2006).

See id.

<sup>32.</sup> See West Testimony at 81.

<sup>33.</sup> See Exhibit VA-4 and Exhibit LYN-5.

competitive alternatives from at least two competitors, and 86 percent have access to service from five or more Verizon competitors.<sup>34</sup>

#### III. USAGE OF ALTERNATIVE SERVICES

Verizon's internal data shows that at least [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] of wireline telephone lines in the Lynchburg region were being served by competitors as of March 2006, and past trends would indicate that that proportion would have increased in the intervening months. However, these figures understate the true market share of competitors, since they fail to account for intermodal competition, such as from wireless and broadband.

Survey data indicates that [BEGIN CONFIDENTIAL]

[END CONFIDENTIAL] of households subscribe to broadband. Taking intermodal competition into account, the data presented below show that Verizon voice lines now account for only 38.7 percent of all wireline telephony, wireless telephony and broadband connections in the region.

Time series data presented at the end of this section also shows that Verizon's wireline market share is falling, both in proportion to the number of wirelines served and relative to the number of households in the region. Taken together, the data presented in detail below demonstrates that the competitive alternatives described in Section II represent viable alternatives for Verizon's BLETS, OLETS and Bundled Services in the Lynchburg region, since customers are actually switching to them in large numbers.

#### A. Traditional CLECs and Cable Telephony

As detailed in Exhibit LYN-15, a total of IBEGIN CONFIDENTIALL

serving nearly 34,000 lines in the Lynchburg MSA as of March 2006, of which 25,039, or 74 percent, were perved using their own last-mile facilities. <sup>26</sup> Altogether, wireline competitors were serving 22.8 percent of all lines in the Lynchburg region. Broken out between business and residential lines competitors serve 16.1 percent of residential lines and 35.8 servent of business.

IEND CONFIDENTIAL] Again, these figures are notable, given that cable telephony is not yet available – but soon will be – in the region.

The competitive penetration figures are consistent with the survey data presented by Mr. Newman, which shows that [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] of residential customers in the Lynchburg MSA are using providers other

<sup>34.</sup> See Exhibit VA-5 and Exhibit LYN-6.

<sup>35.</sup> This figure does not include approximately six percent of the population (who by definition were not reached through Verizon's telephone survey) who have cut the cord altogether. See West Testimony at 63.

<sup>36.</sup> See Exhibit LYN-15.

<sup>37.</sup> See Exhibit LYN-19.

than Verizon.<sup>38</sup> In small MSAs (including the Lynchburg MSA), the survey data shows that 20.3 percent of POTS business customers and 29.9 percent of all business customers are using other providers.<sup>39</sup>

Exhibit LYN-15 also demonstrates that wireline competition is ubiquitous throughout the Lynchburg MSA. It shows that competitors are actually serving both business and residential customers in [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] of the sixteen wire centers in the Lynchburg region (in Allwood two competitors serve residential customers but not business customers), including the smallest and most rural wire centers. Furthermore, facilities-based competition is also widespread. Traditional CLECs using only Verizon's last mile facilities are serving customers in [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] of the sixteen wire centers. These data demonstrate that alternatives to Verizon's BLETS, OLETS and Bundled Services from wireline competitors are available and in widespread use by both residential and enterprise customers throughout the Lynchburg region.

#### B. Mobile Telephony

The survey data presented by Mr. Newman shows that [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] of households in the Lynchburg MSA purchase telephone service from mobile telephone companies.<sup>42</sup> [BEGIN CONFIDENTIAL]

# . [END CONFIDENTIAL] 43

While Mr. Newman's testimony does not provide data on business usage of mobile telephones specifically for the Lynchburg MSA, it does indicate that the proportion of businesses in small MSAs (including the Lynchburg MSA) which purchase mobile telephone service is 50.8 percent, <sup>44</sup> and that 15.5 percent of business respondents consider their mobile telephone to be their primary means of voice communication. <sup>45</sup>

These figures do not include mobile telephone customers who have dropped their wireline service altogether, as these customers were not eligible for the telephone survey. As Mr. West's testimony indicates, national estimates suggest that approximately six percent of residential customers have "cut the cord."

Again, these figures demonstrate that the mobile wireless alternatives available to consumers in the Lynchburg MSA function as actual, viable alternatives to Verizon's BLETS, OLETS and Bundled Services.

See Exhibit VA-21.

<sup>39.</sup> See Exhibit VA-20.

See Exhibit LYN-15.

<sup>41.</sup> See id.

<sup>42.</sup> See Exhibit VA-21.

<sup>43.</sup> See id.

<sup>44.</sup> See Exhibit VA-20.

<sup>45.</sup> See id.

<sup>46.</sup> See West Testimony at 64.

#### C. Broadband and VoIP

3

The survey data presented by Mr. Newman show that [BEGIN CONFIDENTIAL]

# . [END CONFIDENTIAL] 4/

One implication of this data is that the cable companies in the Lynchburg MSA have been successful in selling at least the second (data) leg of their triple-play offerings, and thus have a strong competitive foothold for introduction of their cable telephony offerings. The data also demonstrate that fixed wireless Internet providers are making significant inroads, even in this highly competitive market where wireline alternatives are nearly ubiquitous.

The survey data presented by Mr. Newman show that in small MSAs in Virginia (including the Lynchburg region), 59.1 percent of businesses subscribe to high-speed broadband service. 48

These overall usage rates for broadband demonstrate that the broadband plus VoIP "build your own bundle" option is available today to [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] of residential customers and nearly six in ten businesses in the Lynchburg MSA, which are already signed up for broadband.

### D. Overall Penetration of Wireline and Intermodal Competition

While it is not possible to estimate precisely the number of lines Verizon has lost to wireline and intermodal competitors, it is clear that competition is having a significant impact on Verizon's market share, both in terms of wireline telephony and the overall markets for BLETS, OLETS and bundled services, and that wireline competitors are winning a growing proportion of customers. The data also indicate that intermodal competitors are winning a growing proportion of customers from wireline carriers of all types (i.e., including both Verizon and the traditional CLECs and cable telephony providers).

Both Verizon's line count and its wireline market share in the Lynchburg MSA are dropping rapidly. As indicated in Figure 2 below, between December 2003 and March 2006 (i.e., in 27 months), the ratio of Verizon lines to households fell from [BEGIN CONFIDENTIAL]

[END CONFIDENTIAL] drop in Verizon's residential wireline count. 50

During this same 27-month period, the number of total wirelines served by wireline CLECs rose by [BEGIN CONFIDENTIAL]

<sup>47.</sup> See Exhibit VA-21.

<sup>48.</sup> See Exhibit VA-20.

<sup>49</sup> See Exhibit RICH-19.

<sup>50.</sup> See id.

<sup>51.</sup> See id.

# [END CONFIDENTIAL] 52

Figure 2 also demonstrates the significance of intermodal competition from wireless telephony and from broadband plus VoIP "build you own" bundles. It shows that the ratio of combined Verizon and CLEC residential lines to households fell from [BEGIN CONFIDENTIAL]

[END CONFIDENTIAL] <sup>53</sup> Assuming people have not stopped using voice telephony altogether, these data clearly indicate that wireless and broadband providers are competing effectively with both Verizon and other traditional wireline providers – a conclusion which is consistent with the high rates of wireless telephony usage and broadband adoption discussed in above.

[BEGIN CONFIDENTIAL]

#### [END CONFIDENTIAL]

Another perspective on Verizon's loss of overall share is shown in Figure 3 below, which shows the percentage of total connections – including wireline telephony, wireless telephony and broadband connections – served by Verizon, based on the survey conducted by Mr. Newman. As

See id.

<sup>53.</sup> See id.

the figure shows, Verizon voice lines now account for only 38.7 percent of all wireline telephony, wireless telephony and broadband connections.<sup>54</sup>

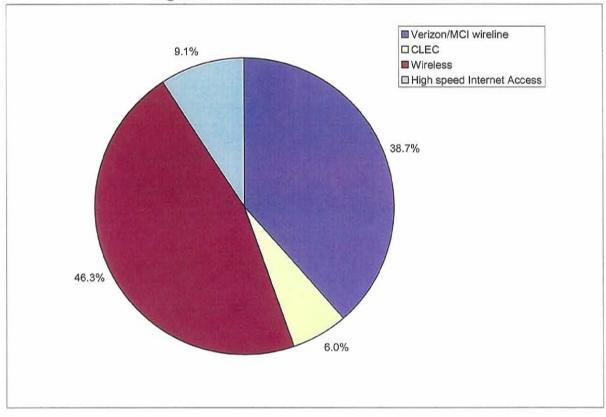


Figure 3: Verizon Share of Total Connections

#### IV. POTENTIAL COMPETITION AND ENTRY

While it is clear from the evidence presented above that actual competition already in the marketplace is extensive, even in the absence of additional entry, it is equally clear that entry has occurred, is occurring and is likely to continue occurring in the future. Competition in the Lynchburg MSA is thus certain to become even more intense in the coming months and years.

First, both Charter and Comcast have committed to rolling out cable telephony throughout their service territories in the Lynchburg region, <sup>55</sup> and Jet Broadband is completing the upgrade that will make its system cable telephony-ready. As a result, all three firms, which together pass more than 65 percent of all households, will be in a position to enter the market in a timely fashion with little or no additional investment. <sup>56</sup>

<sup>54.</sup> See Exhibit VA-22.

<sup>55.</sup> Charter customer service representatives confirmed this telephony rollout plan. See West Testimony at 48. See Comcast, FAQ, https://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=3804 (last visited Dec. 3, 2006); id. at https://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=3807 (last visited Dec. 3, 2006).

<sup>56.</sup> See Exhibit VA-10.

Entry and expansion is also underway from two providers of broadband services using alternative technologies, B2X, a wireless broadband provider that already serves the neighboring Roanoke MSA, and the Central Virginia Electric Cooperative, which provides BPL service in the Charlottesville MSA and has announced plans to expand into the Lynchburg region.

B2X offers affordable fixed wireless services to both residential and business customers in much of the Roanoke MSA.<sup>57</sup> The company has announced plans to expand into Lynchburg, specifically Bedford County, a portion of which lacks coverage from cable modem service.<sup>58</sup>

The Central Virginia Electric Cooperative, in partnership with the International Broadband Electric Corporation, has deployed BPL services in Nelson County and announced its intention to roll the service out over the entire CVEC footprint. As shown in Figure 4 below, CVEC's grid covers much of Appomattox County and the northern part of Amherst County. Its potential entry is especially significant in Appomattox County, which is lacking in cable television coverage. Because BPL installations rely on the existing electrical grid, they can be installed quickly and for a minimal investment.

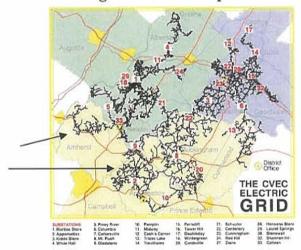


Figure 4: Central Virginia Electric Cooperative Service Territory

NTELOS is also well positioned to expand services in the area. It is already [BEGIN CONFIDENTIAL] , [END

**CONFIDENTIAL**] as well as providing both mobile wireless and its Portable Broadband product in the region. NTELOS' commitment to the Lynchburg MSA was highlighted at the recent AWS auction, where it paid \$162,000 for additional spectrum in the area.<sup>61</sup>

<sup>57.</sup> See B2X, Availability, http://www.b2xonline.com/availability.asp (last visited July 21, 2006).

<sup>58.</sup> B2X, Availability, http://www.b2xonline.com/availability.asp (last visited Nov. 22, 2006).

<sup>59.</sup> See http://www.forcvec.com/bplcoop/Update%20Page.html.

<sup>60.</sup> See http://www.forcvec.com/bplcoop/where/CVEC\_Substations.html.

See FCC, Auction 66 – Advanced Wireless Services (AWS -1), available at http://wireless.fcc.gov/auctions/default.htm?job=auction\_summary&id=66 (last visited Nov. 21, 2006).

In addition, non-facilities based companies, which provide services using resale and/or Wholesale Advantage services purchased from Verizon, are completely unconstrained in their ability to expand services. In the event of a price increase by Verizon, these companies could and would accommodate customers wishing to switch away from Verizon's services.

More broadly, barriers to entry in the Lynchburg MSA are extremely low. Several competitive fiber providers have points of presence in the region, including Continental VisiNet and NTELOS. <sup>62</sup> The widespread presence of cell towers throughout the region (there are towers in fifteen of the sixteen wire center areas, and 17 new towers have been constructed since 2004) means that the mobile and fixed wireless entry is also inexpensive. Finally, a significant portion of the land area is rural, and thus potentially eligible for funding from the RUS. Moreover, two of five counties in the Lynchburg MSA (Appomattox and Campbell) are eligible for support from the Tobacco Commission. <sup>63</sup>

#### V. CONCLUSION

Competition for retail telephone services in the Lynchburg MSA is intense and certain to become more intense in coming years. By every measure, Verizon is already losing customers to traditional CLECs and intermodal competitors at a rapid pace, and this decline is taking place at current prices. Importantly, these competitive pressures are being felt even before cable telephony is widely available in the area. If Verizon were to raise prices above competitive levels, it would both accelerate the rate at which it is losing customers to existing competitive services, and increase the rate at which competitors and potential competitors deploy new services. The current level of competition, combined with the presence of numerous and robust competitors poised to enter the region, are fully adequate to regulate the price of Verizon's retail telephone services in this region.

<sup>62.</sup> See Eisenach Testimony at III.B. and Exhibit VA-18.

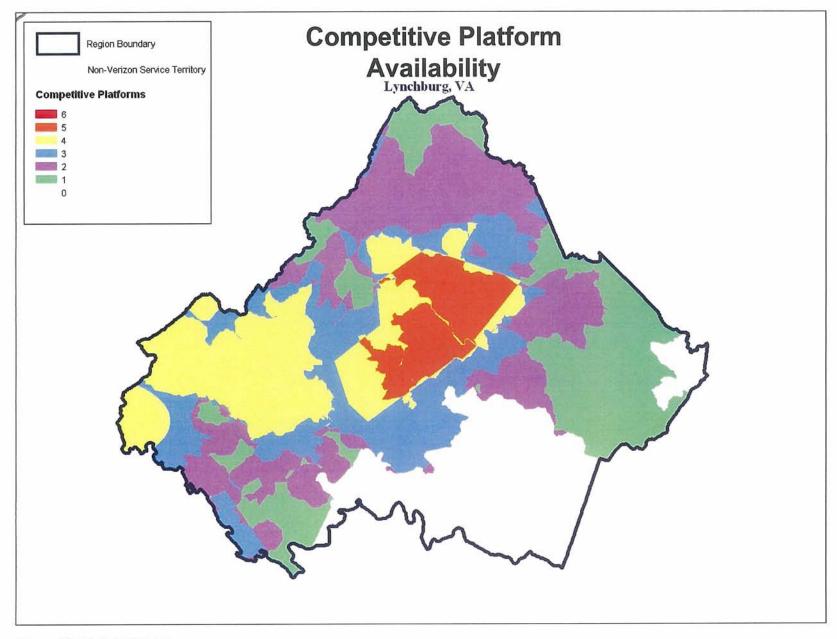
<sup>63.</sup> See Eisenach Testimony at Table 2.

<sup>64.</sup> An analysis conducted by Mr. Taylor estimates that a decision by Verizon to raise prices by 5 percent in the Lynchburg MSA would result in a *net* revenue loss of [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] annually. See Taylor Testimony, Table 14 at 94.

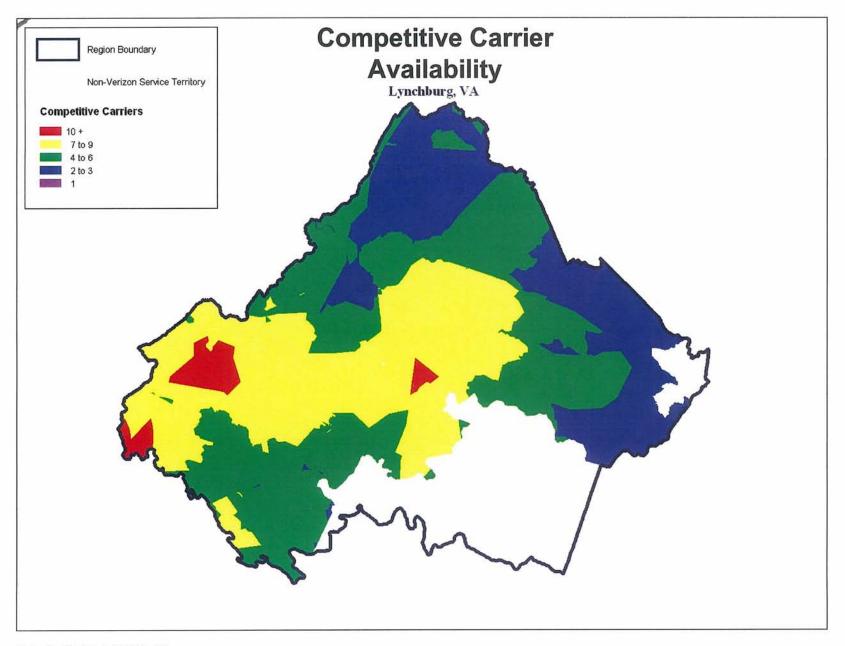
# Wire Centers by Rate Group, Exchange, City and County

	LOC			Rate			
REGION	ST	WIRECENTER	LOCATION NAME	Group	Exchange	CENTRAL OFFICE CITY	COUNTY
LYNCHBURG, VA	VA-E	BDFRVABD	BEDFORD VA	07	BEDFORD	BEDFORD	Bedford City
		BGISVABI	BIG ISLAND VA	06	BIG ISLAND	BIG ISLAND	Bedford
		CNCRVACN	CONCORD VA	06	CONCORD	CONCORD	Campbell
		LYBGVACH	CHURCH STREET VA	06	LYNCHBURG	LYNCHBURG	Lynchburg City
		LYBGVACV	CLEARVIEW DRIVE VA	06	LYNCHBURG	LYNCHBURG	Lynchburg City
		LYBGVAMH	MADISON HEIGHTS VA	06	LYNCHBURG	MADISON HEIGHTS	Amherst
		LYBGVANL	NEW LONDON ROAD VA	06	LYNCHBURG	LYNCHBURG	Bedford
		LYBGVAOF	OLD FOREST ROAD VA	06	LYNCHBURG	LYNCHBURG	Lynchburg City
		LYBGVATM	TIMBERLAKE ROAD VA	06	LYNCHBURG	LYNCHBURG	Lynchburg City
		LYBGVAYB	YELLOW BRANCH VA	06	LYNCHBURG	RUSTBURG	Campbell
		SNMTVASM	STONE MOUNTAIN VA	07	STONE MOUNTAIN	BEDFORD	Bedford
		SWVLVASV	STEWARTSVILLE VA	07	MONTVALE/ROANOKE	STEWARTSVILLE	Bedford
	VA-S	ALWDVAXA	ALLWOOD	09	ALLWOOD	ALLWOOD	Amherst
	2200	AMHRVAXA	AMHERST	08	AMHERST	AMHERST	Amherst
		APMTVAXA	APPOMATTOX	08	APPOMATTOX	APPOMATTOX	Appomattox
		PMPLVAXA	PAMPLIN	09	PAMPLIN	PAMPLIN	Appomattox

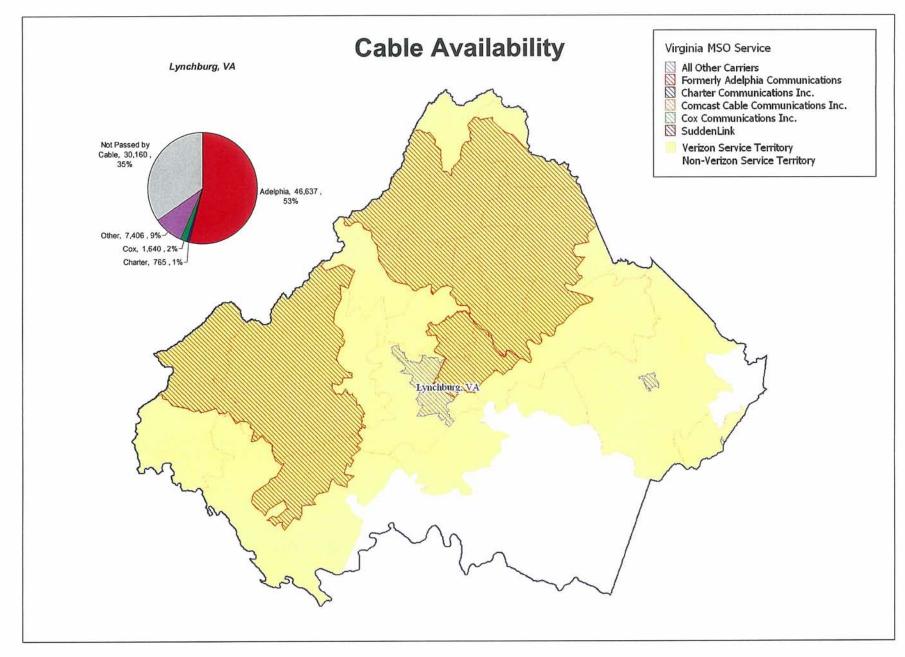
# CONFIDENTIAL EXHIBIT LYN-4

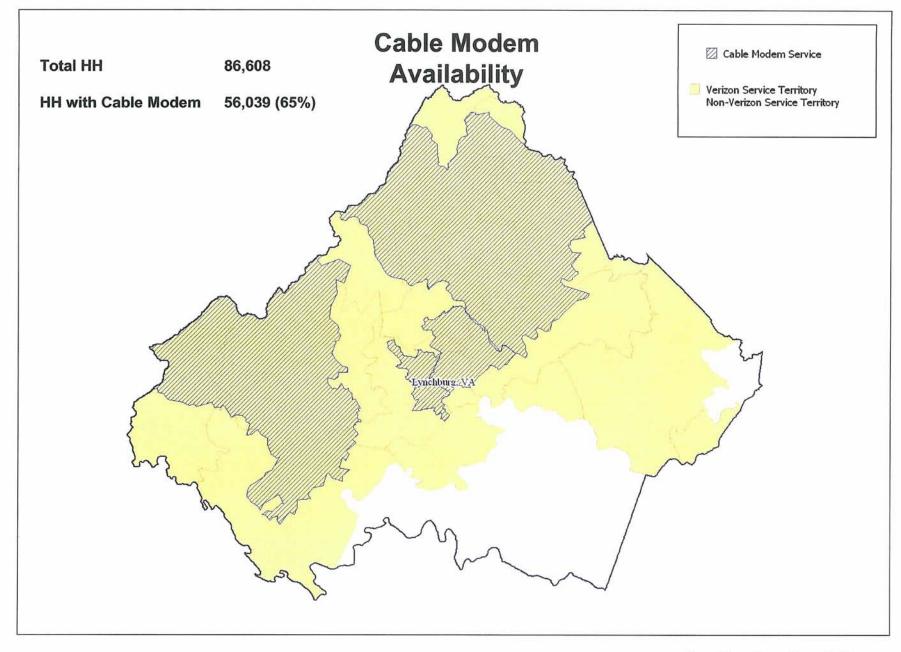


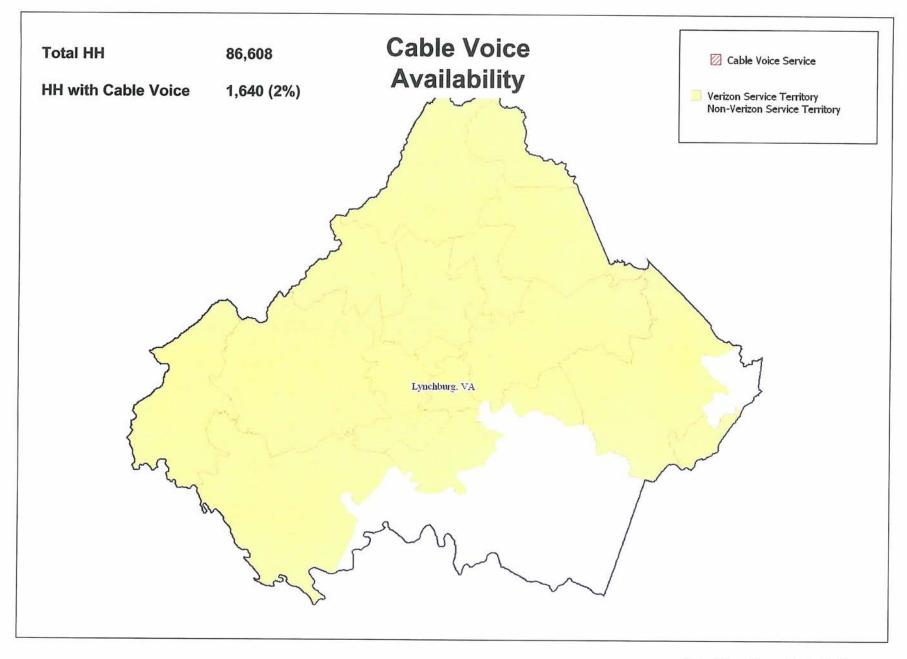
**Exhibit LYN-5** 

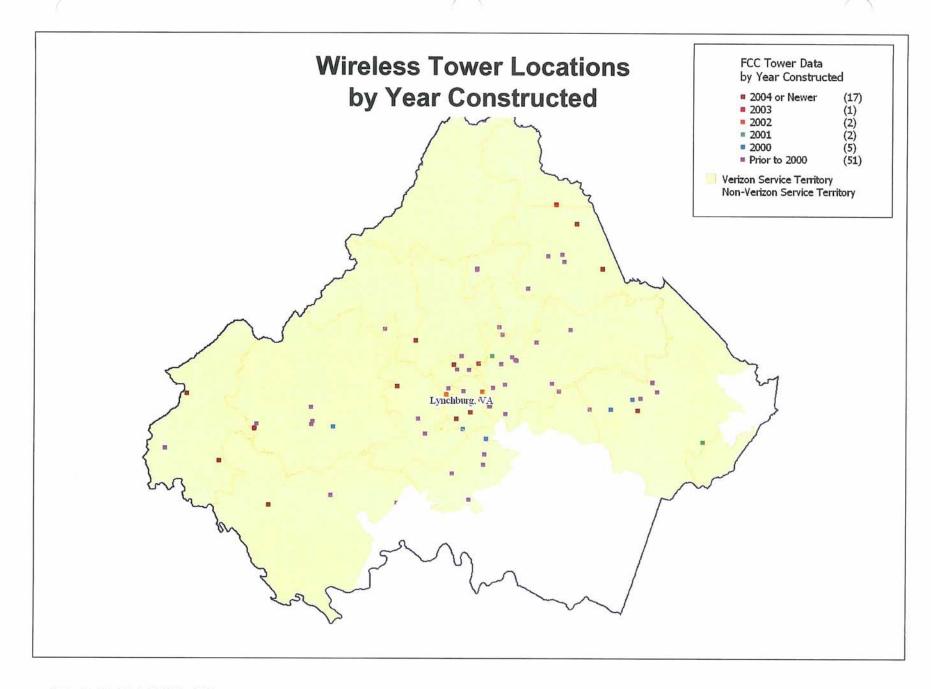


**Exhibit LYN-6** 









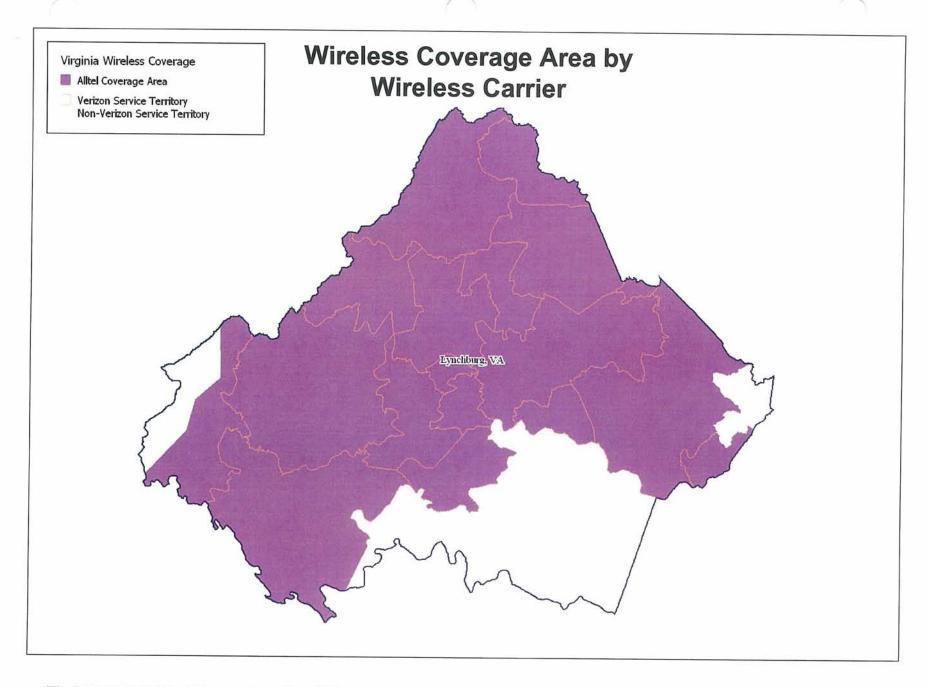


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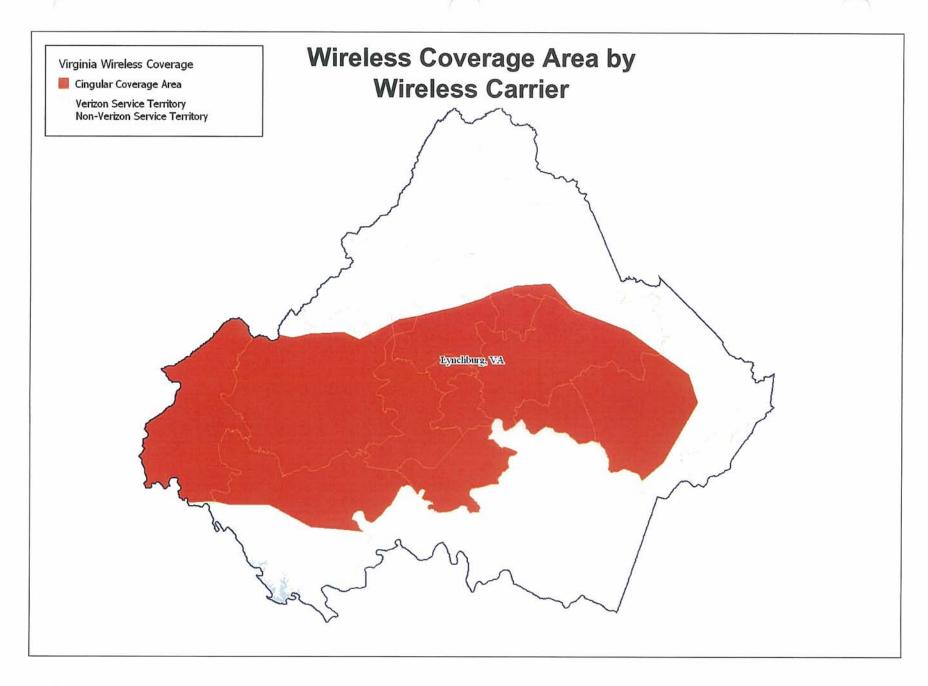


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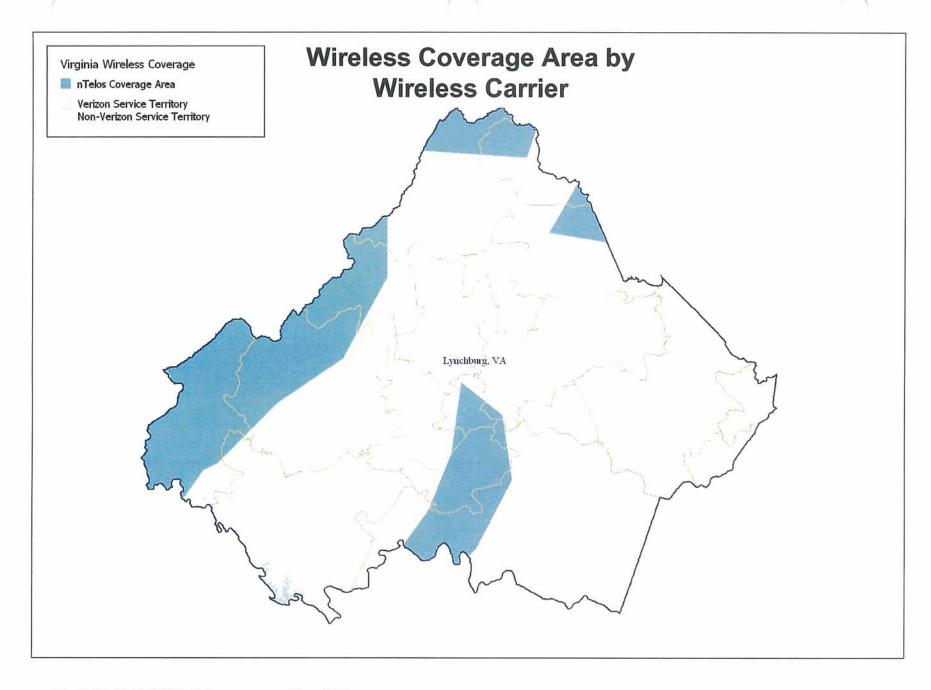


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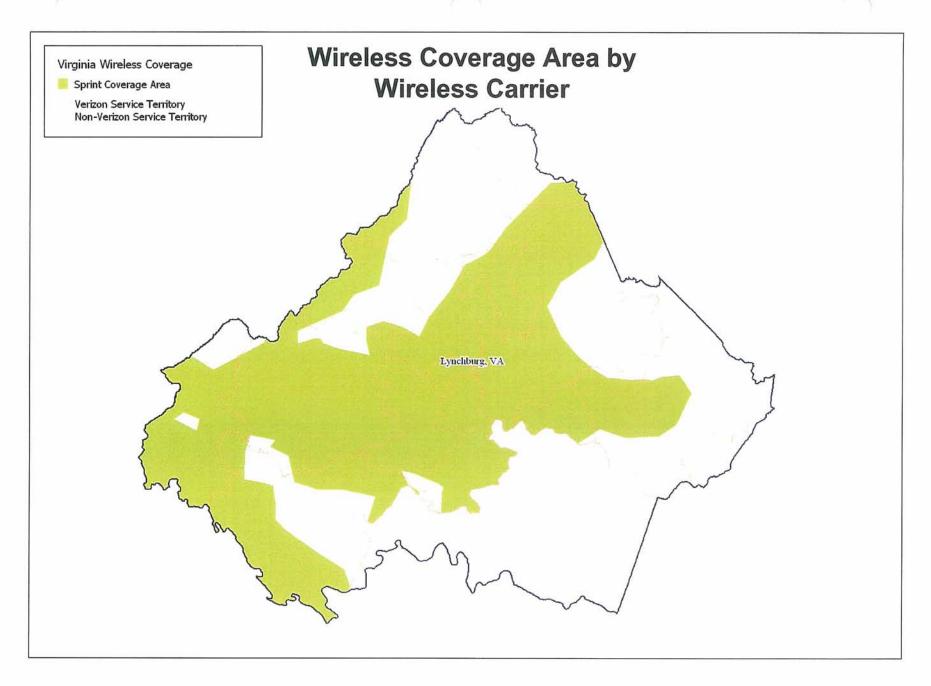


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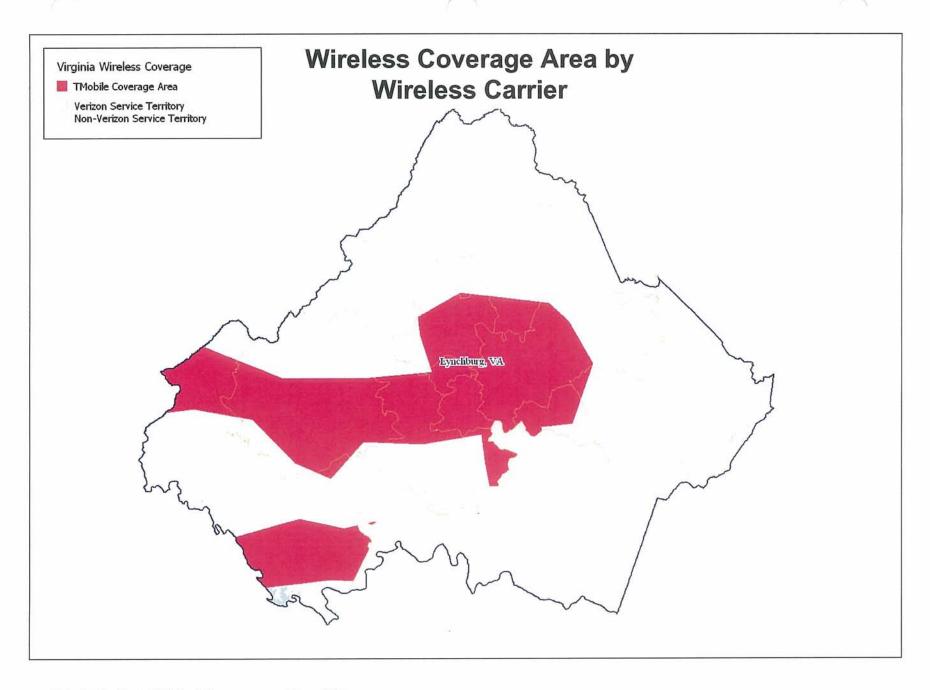


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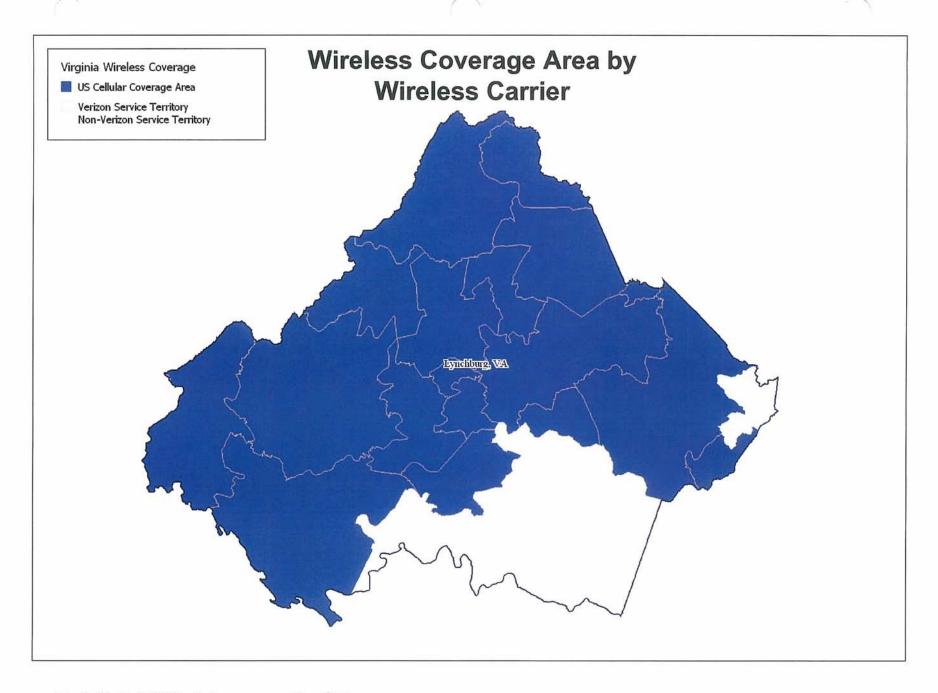


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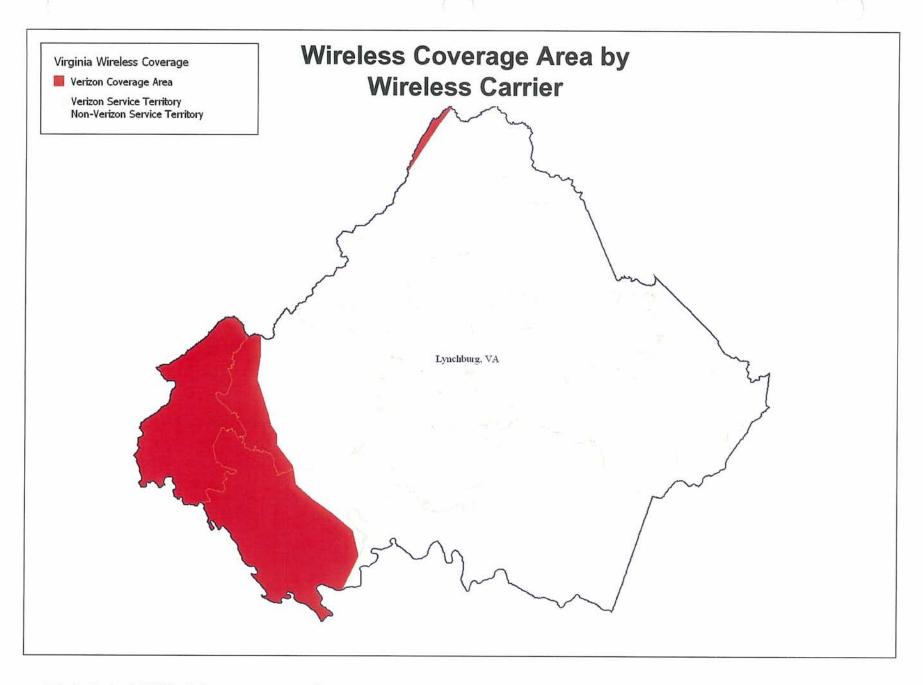
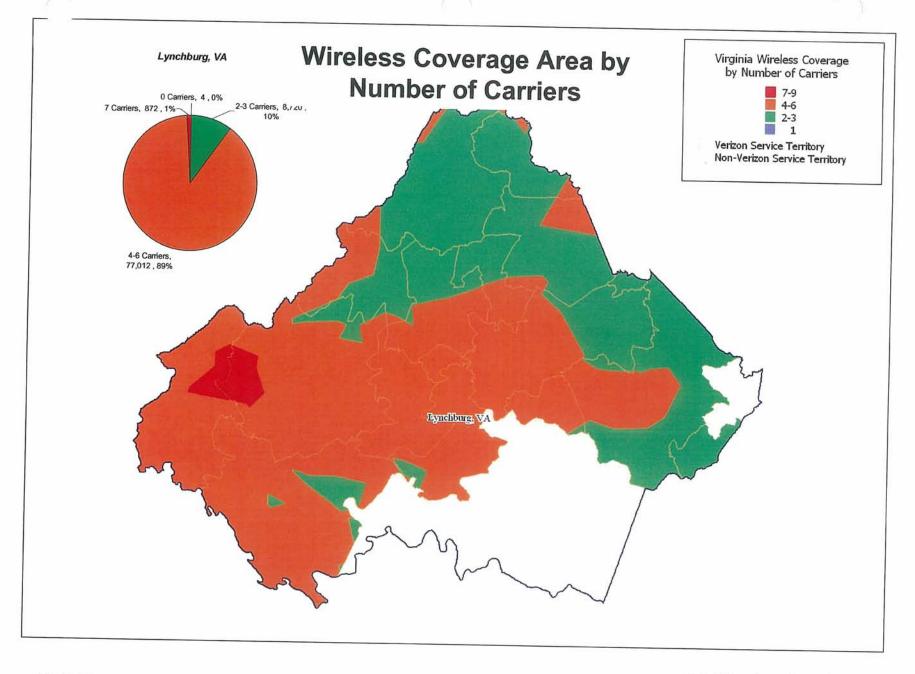
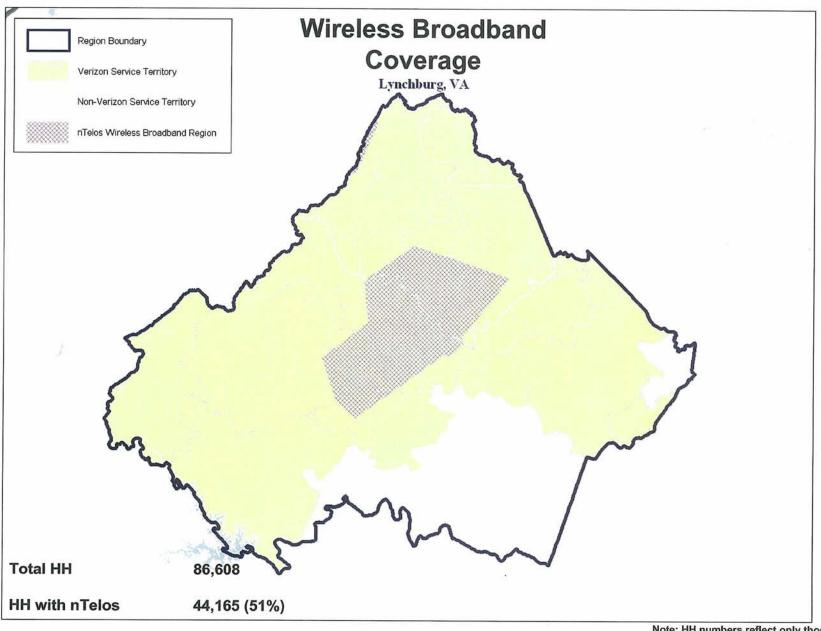
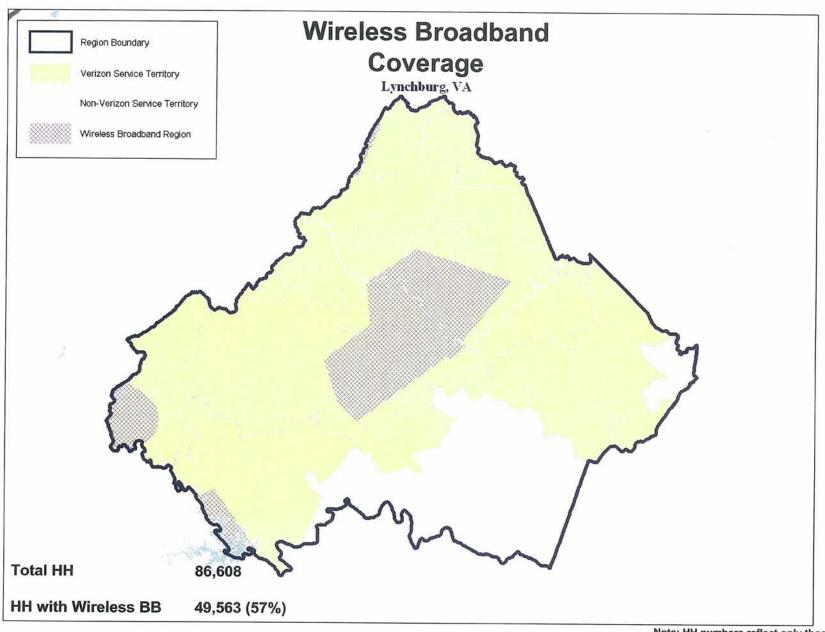


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## CONFIDENTIAL EXHIBIT LYN-14

## CONFIDENTIAL EXHIBIT LYN 15

# CONFIDENTIAL EXHIBIT LYN-16

# CONFIDENTIAL EXHIBIT LYN 17

# CONFIDENTIAL EXHIBIT LYN-18

# CONFIDENTIAL EXHIBIT LYN-19.